

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

In re:

SEARS HOLDINGS CORPORATION, *et al.*,

Debtors.

Chapter 11

Case No. 18-23538 (RDD)

(Jointly Administered)

**[PROPOSED] ORDER GRANTING MOTION FOR RELIEF FROM  
AMENDED STIPULATED PROTECTIVE ORDER**

Upon the *Motion for Relief from Amended Stipulated Protective Order* (the “*Motion*”, Docket No. \_\_\_\_ ) filed by creditor Santa Rosa Mall, LLC (“Santa Rosa”), on February 10, 2020, for entry of an order (this “*Order*”) releasing it from the limitations on use and disclosure set forth in the *Amended Stipulated Protective Order* (Docket No. 1084) and modifying the “confidential” designation of certain Discovery Material; and the Court having found that it has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334; and the Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and the Court having found that venue of this proceeding and the *Motion* in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and the Court having found that Santa Rosa provided appropriate notice; and this Court having determined that the legal and factual bases set forth in the *Motion* establish just cause for the relief granted herein; and upon all of the proceedings had before the Court; and after due deliberation and sufficient cause appearing therefor; and the Court having held a hearing to consider the relief requested on February 24, 2020 at 10:00 A.M. (Eastern Time) (the “Hearing”); and after due deliberation, the Court having concluded that Santa Rosa has established sufficient cause for the relief granted herein,

**IT IS HEREBY ORDERED THAT:**

1. The *Motion* (Docket No. \_\_\_\_ ) is GRANTED.
2. Santa Rosa is released from the *Amended Stipulated Protective Order*’s limitations on use and disclosure, and the “confidential” designation of certain Discovery Material, as further defined in the *Motion*, is modified to permit Santa Rosa to use, disclose and/or file the same in connection with its independent non-bankruptcy causes of action or related conversations.

3. Santa Rosa is authorized to take all actions necessary to effectuate this *Order*.
4. This Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this *Order*.

Dated: \_\_\_\_\_, 2020  
White Plains, New York

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HONORABLE ROBERT D. DRAIN  
UNITED STATES BANKRUPTCY JUDGE